



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Navy City Metals, Bremerton, WA

**FROM:** Daniel Heins, Environmental Scientist  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Supervisor  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Navy City Metals

**Facility Location:** 3587 W Belfair Valley Road, Bremerton, WA

**Date of Inspection:** August 1, 2022

**EPA Inspector(s):**

1. Daniel Heins, Environmental Scientist

**Other Attendees:**

1. Levi Taylor, Manager – Binford Metals
2. Sam Hoskinson, Heavy Machinery Operator / Yard Manger – Binford Metals

**Contact Email Address:** levitaylor81@hotmail.com

**Purpose of Inspection:** Ozone depleting substances/refrigerants compliance inspection

**Facility Type:** Scrap yard

**Regulations Central to Inspection:** 40 CFR Part 82 Subpart F

**Arrival Time:** 10:50

**Departure Time:** 11:40

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet (via email)
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Navy City Metals representatives.

**Process Description:**

Navy City Metals (“the Facility”) receives and processes scrap metal, including cars, from commercial sources, the general public, and scrap peddlers . The Facility has a crusher and conducts torch cutting. The Facility receives the loads of scrap and separates out different metal types for re-sale. The Facility does not have a shredder.

**Staff Interview:**

The Facility does not accept refrigerators or other potentially refrigerant-containing appliances from peddlers or the general public, with this being stated both by sign next to their scale and on their website. If a customer brings a refrigerator or similar appliance, staff will instruct them to bring the appliance to either Allbest Appliances or the Olympic View Transfer Station, both in Bremerton. Those facilities will recover the refrigerants themselves, and Navy City Metals picks up loads of appliances from those locations. These loads contain both appliances with their refrigerants recovered and appliances that would have never contained refrigerants. Levi Taylor stated that Navy City Metals does not have any contracts on file stating that the two facilities would ensure refrigerants are properly recovered, though said he could get that documentation from the two locations. The Facility gets roughly two loads per week from Allbest and one load per week from the Olympic View Transfer Station. Each load is 2-3 tons each, but only about a third of each load is appliances that previously contained refrigerants.

The Facility receives roughly 100 cars per week, though this is variable pending purchases at auctions. The Facility does not have any refrigerant recovery equipment on site, though Sam Hoskinson stated that they bring a technician down from Allbest on a roughly weekly basis to remove refrigerants from the cars/motor vehicle air conditioners (MVACs).

## **TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

### **Data Collected and Observations:**

Sam Hoskinson walked Daniel Heins through the Facility. Daniel Heins noted the sign stating that they do not accept freezers or refrigerators. Daniel Heins did not see any appliances with cut refrigerant lines in the scrap piles.

**Photos and/or Videos:** were taken during the inspection. See Appendix A.

**Field Measurements:** were not taken during this inspection.

## **CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

### **Requested documents:**

- Contracts confirming refrigerant removal from their suppliers of small appliances
- Most recent two invoices for technician removing refrigerants from the MVACs

### **Compliance Assistance:**

Daniel Heins provided via email links to EPA resources on compliance with ozone depleting substances regulations and highlighted the most relevant provisions for the Facility's operations. During the inspection Daniel Heins explained the requirements for safe disposal of appliances under Subpart F.

During the inspection conference, Daniel Heins emphasized that the Facility is obligated as a final processor to have contracts on file for all suppliers of small appliances drained of refrigerants confirming that the suppliers will properly remove all refrigerants prior to delivery.

### **Concerns:**

Daniel Heins expressed concern that the Facility did not have any records on hand to verify that their small appliance suppliers have properly recovered refrigerants.

## **DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_

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#### **APPENDICES AND ATTACHMENTS**

Appendix A: Digital Image Log

**Facility Name:** Navy City Metals

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**APPENDIX A: DIGITAL IMAGE LOG**

<b>Inspector Name:</b> Daniel Heins	<b>1. Archival Record Location:</b> EPA R5 Electronic Records Center
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<b>Image Number</b>	<b>File Name</b>	<b>Date/Time (PDT)</b>	<b>Description of Image</b>
1	DSC02399.jpg	2022-08-01 12:38	Sign by scale stating “WE DO NOT ACCEPT! FREEZERS REFRIGERATORS BALLAST COMP. MONITORS BEER KEGS and TVs”
2	DSC02400.jpg	2022-08-01 12:38	Facility entrance sign